

**Exhibit 1**  
**(June 19, 2024 Email Exchange)**



Anthony Paronich &lt;anthony@paronichlaw.com&gt;

**Re: Katz v. Allied First**

1 message

**Anthony Paronich** <anthony@paronichlaw.com>  
To: Carmen Thomas <Carmen.Thomas@nelsonmullins.com>  
Cc: a@perronglaw.com

Wed, Jun 19, 2024 at 5:41 PM

When will the letter be sent, by the end of the week?

On Jun 19, 2024, at 5:32 PM, Carmen Thomas <Carmen.Thomas@nelsonmullins.com> wrote:

We're not going to be able to go forward on Monday with the deposition. There have been personnel changes, and we are still preparing. I am hoping to have date options at least by next week and will let you know as soon as possible.

I also have had something personal come up tomorrow afternoon that took away most of the time I had available. At the moment, I could do between 12-2 ET or 2:30-3. Do either of those windows work? If not, then on Friday, right now I could talk before 10:30 ET or between 12:30-3. We will also work on a letter to set forth our positions, so we could talk after that too or instead.

Thanks.

Carmen

**CARMEN HARPER THOMAS PARTNER**

carmen.thomas@nelsonmullins.com

**MERIDIAN | 17TH FLOOR****1320 MAIN STREET | COLUMBIA, SC 29201****T 803.255.9385 F 803.256.7500****NELSONMULLINS.COM VCARD VIEW BIO**

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**From:** Anthony Paronich <anthony@paronichlaw.com>  
**Sent:** Tuesday, June 18, 2024 1:48 PM  
**To:** Carmen Thomas <Carmen.Thomas@nelsonmullins.com>  
**Cc:** Andrew Perrong <a@perronglaw.com>  
**Subject:** RE: Katz v. Allied First

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How about 4:00 EST on Thursday? We are thinking virtual. We're fine to move the Monday date if we have new dates on our Thursday call.

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**From:** Carmen Thomas <Carmen.Thomas@nelsonmullins.com>  
**Sent:** Tuesday, June 18, 2024 12:04 PM  
**To:** Anthony Paronich <anthony@paronichlaw.com>  
**Cc:** Andrew Perrong <a@perronglaw.com>  
**Subject:** RE: Katz v. Allied First

Anthony,

I could not make the call today work. Can we set something potentially for this Thursday afternoon?

We also are not able to present a witness on Monday, June 24<sup>th</sup>. I am working to get some alternative dates. Will this be virtual?

Thank you.

Carmen



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CARMEN HARPER THOMAS PARTNER

carmen.thomas@nelsonmullins.com

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T 803.255.9385 F 803.256.7500

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**From:** Anthony Paronich <anthony@paronichlaw.com>  
**Sent:** Tuesday, June 18, 2024 10:17 AM  
**To:** Carmen Thomas <Carmen.Thomas@nelsonmullins.com>  
**Cc:** Andrew Perrong <a@perronglaw.com>  
**Subject:** Re: Katz v. Allied First

Hello, Carmen. Just wanted to confirm the deposition for Monday and make ourselves available for this discussion.

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Anthony Paronich

Paronich Law, P.C.

350 Lincoln Street, Suite 2400

Hingham, MA 02043

[o] (617) 485-0018

[c] (508) 221-1510

[f] (508) 318-8100

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On Thu, Jun 13, 2024 at 2:33 PM Anthony Paronich <anthony@paronichlaw.com> wrote:

Does Tuesday at 2:00 PM EST work?

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**From:** Carmen Thomas <Carmen.Thomas@nelsonmullins.com>  
**Sent:** Wednesday, June 12, 2024 6:09 PM  
**To:** Anthony Paronich <anthony@paronichlaw.com>  
**Cc:** Andrew Perrong <a@perronglaw.com>  
**Subject:** RE: Katz v. Allied First

I had a deposition moving around that today was confirmed for Monday at 1 pm, so I think Tuesday or Thursday may be better if you are available then.

Carmen



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CARMEN HARPER THOMAS PARTNER

carmen.thomas@nelsonmullins.com

MERIDIAN | 17TH FLOOR

1320 MAIN STREET | COLUMBIA, SC 29201

T 803.255.9385 F 803.256.7500

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**From:** Anthony Paronich <anthony@paronichlaw.com>  
**Sent:** Tuesday, June 11, 2024 10:47 AM  
**To:** Carmen Thomas <Carmen.Thomas@nelsonmullins.com>  
**Cc:** Andrew Perrong <a@perronglaw.com>  
**Subject:** RE: Katz v. Allied First

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Sure, how about Monday?

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**From:** Carmen Thomas <Carmen.Thomas@nelsonmullins.com>  
**Sent:** Tuesday, June 11, 2024 10:09 AM  
**To:** Anthony Paronich <anthony@paronichlaw.com>; Scheduling Department Mailbox <scheduling@magnals.com>  
**Cc:** Andrew Perrong <a@perronglaw.com>  
**Subject:** RE: Katz v. Allied First

Good morning. I'm checking on whether a witness will be available that date and will get back to you asap. Also, several of the topics are overly broad, and we will need to confer about narrowing them. Are you available for that any days next week?

Thank you.

Carmen



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CARMEN HARPER THOMAS PARTNER

carmen.thomas@nelsonmullins.com

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1320 MAIN STREET | COLUMBIA, SC 29201

T 803.255.9385 F 803.256.7500

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**From:** Anthony Paronich <anthony@paronichlaw.com>  
**Sent:** Tuesday, June 11, 2024 10:07 AM  
**To:** Carmen Thomas <Carmen.Thomas@nelsonmullins.com>; Scheduling Department Mailbox <scheduling@magnals.com>  
**Cc:** Andrew Perrong <a@perronglaw.com>  
**Subject:** Re: Katz v. Allied First

Hello, Carmen. Following up here again.

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Anthony Paronich

Paronich Law, P.C.

350 Lincoln Street, Suite 2400

Hingham, MA 02043

[o] (617) 485-0018

[c] (508) 221-1510

[f] (508) 318-8100

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On Tue, Jun 4, 2024 at 1:55 PM Anthony Paronich <anthony@paronichlaw.com> wrote:

Hello, Carmen. I just wanted to confirm we're going forward on this date.

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Anthony Paronich

Paronich Law, P.C.

350 Lincoln Street, Suite 2400

Hingham, MA 02043

[o] (617) 485-0018

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[f] (508) 318-8100

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On Tue, May 21, 2024 at 10:36 AM Anthony Paronich <anthony@paronichlaw.com> wrote:

Hello, Carmen. The Plaintiff's 30(b)(6) notice is attached.

Please let us know if the date does not work. Magna, can you please send around Zoom information to all copied here.

Regards,

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Anthony Paronich

Paronich Law, P.C.

350 Lincoln Street, Suite 2400

Hingham, MA 02043

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[f] (508) 318-8100

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